

1 **GEORGE M. RANALLI, ESQ.**
Nevada Bar No. 5748
2 **JOHN W. KIRK, ESQ.**
Nevada Bar No. 4654
3 **RANALLI & ZANIEL, LLC**
2400 W. Horizon Ridge Parkway
4 Henderson, Nevada 89052
Telephone: (702) 477-7774
5 Facsimile: (702) 477-7778
Attorneys for Defendant,
6 STATE FARM MUTUAL AUTOMOBILE
INSURANCE COMPANY

7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT COURT OF NEVADA**

9 DEBORAH BURNETT-PIRRONE,)
10)
Plaintiff,) CASE NO.:
11)
12 vs.)
13 STATE FARM MUTUAL AUTOMOBILE)
INSURANCE COMPANY, an Illinois)
14 corporation; DOES I through X, and)
ROE CORPORATIONS I through X,)
15 inclusive,)
16 Defendants.)

17 **DEFENDANT'S NOTICE OF REMOVAL**

18 TO: LANCE WILSON, Clerk, United States District Court for
19 the District Court of Nevada.

20 PLEASE TAKE NOTICE that Defendant, STATE FARM MUTUAL
21 AUTOMOBILE INSURANCE COMPANY, (hereinafter referred to as
22 Defendant) hereby removes the state court action titled DEBORAH
23 BURNETT-PIRRONE vs. STATE FARM MUTUAL AUTOMOBILE INSURANCE
24 COMPANY, Case No. A-15-715116-C, filed in the 8th Judicial

1 District Court for the State of Nevada, in and for the County of
2 Clark, to this Court. A copy of the Complaint and Proof of
3 Service are attached hereto as Exhibit "A" and are incorporated
4 herein by reference.

5 The grounds for removal are:

- 6 1. This Court has original subject matter jurisdiction over
7 this action pursuant to 28 U.S.C. §1332 and 28 U.S.C.
8 §§1441 (a)-(c), in that it is a civil action between
9 citizens of different states and, upon information and
10 belief, the matter in controversy exceeds \$75,000.00
11 exclusive of interest and costs, as set forth below.
- 12 2. Plaintiff DEBORAH BURNETT-PIRRONE is a resident of Clark
13 County, State of Nevada.
- 14 3. Defendant, STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY,
15 hereinafter, Defendant, is a corporation doing business and
16 incorporated under the laws of the State of Illinois, with
17 its principal place of business being in Bloomington,
18 Illinois, and, as such at all relevant times therein has
19 never been a citizen of the State of Nevada.
- 20 4. The Defendants sued as DOES 1-X and ROE CORPORATIONS 1-X
21 are fictitious parties and are not relevant to the
22 determination of subject matter jurisdiction. See 28 U.S.C.
23 § 1441(a) (For purposes of removal jurisdiction under this
24

chapter, the citizenship of defendants sued under fictitious names shall be disregarded.)

5. This lawsuit is premised on alleged breach of contract, and violation of unfair claims practices act in connection with its investigation of Plaintiff's underinsured motorist claim arising out of motor vehicle accident in which Plaintiff was involved on March 25, 2010. As a result of Defendant's actions, Plaintiff is seeking: general damages; special damages; pre-judgment interest, and attorney fees and costs. Plaintiff is also seeking exemplary and punitive damages.

6. Venue is appropriate in this Court pursuant to 28 U.S.C. §§ 1441(a) and 1446(a)-(b), and Local Rule 8-1. This action was originally brought in the 8th Judicial District Court, Clark County, State of Nevada and the Complaint alleges that the events claimed give rise to liability which occurred in Clark County, Nevada.

7. This Notice of Removal is timely filed within thirty days of service as required by 28 U.S.C. § 1446(b) in that it is filed within thirty days after March 20, 2015, which is when Plaintiff served Defendant with a copy of the Summons and Complaint via Commissioner of Insurance.

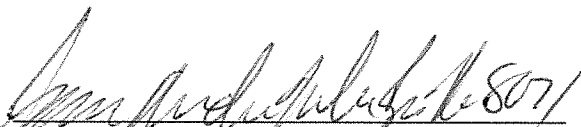
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1 8. Pursuant to 28 U.S.C. §1446 (d), Defendant has prepared and
2 will file with the Clerk of the 8th Judicial District Court
3 a Notice of Removed Action.

4 DATED this 17 day of April, 2015.

5 **RANALLI & ZANIEL, LLC**

6
7 
8 **GEORGE M. RANALLI, ESQ.**

9 Nevada Bar No. 5748

10 **JOHN W. KIRK, ESQ.**

11 Nevada Bar No. 4654

12 2400 W. Horizon Ridge Parkway

13 Henderson, Nevada 89052

14 Attorneys for Defendant
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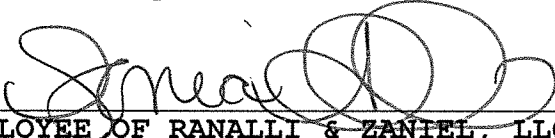
CERTIFICATE VIA CM/ECF

Pursuant to FRCP 5, I hereby certify that I am an employee of RANALLI & ZANIEL, LLC, and that on the 17 day of April, 2015, I caused to be served via CM/ECF a true and correct copy of the document described herein.

Document Served: NOTICE OF REMOVAL -FEDERAL COURT

Person(s) Served:

Michaela E. Tramel, Esq.
TRAMEL LAW GROUP, LLC
9480 S. Eastern Avenue
Suite 257
Las Vegas, Nevada 89123
Attorney for Plaintiff


An EMPLOYEE OF RANALLI & ZANIEL, LLC

RANALLI & ZANIEL, LLC
2400 WEST HORIZON RIDGE PARKWAY
HENDERSON, NEVADA 89052
TELEPHONE: (702) 477-7774 FAX: (702) 477-7778

EXHIBIT "A"

Mar 30 15 10:14a

p.7

MAR. 26. 2015 12:50PM

MAR 19 2015

DISTRICT COURT CIVIL COVER SHEET

NO. 019- P. 7/15
A-15-715110-C

VIII

DIVISION OF INSURANCE
STATE OF NEVADA

Case No.

Assigned by Chief Clerk

I. Party Information (provide both home and mailing addresses if different)	
Plaintiff(s) (name/address/phone): DEBORAH BURNETT-PERONE 8480 S. EASTERN AVE., SUITE 257 Las Vegas, NV 89123 702-233-2244	Defendant(s) (name/address/phone): STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY
Attorney (name/address/phone): Michaela E. Tranel, Esq. 9430 S. Eastern Ave., Ste. 257 Las Vegas, NV 89123 702-233-2244	Attorney (name/address/phone):

II. Nature of Controversy (please select the most appropriate filing type below)

Civil Case Filing Types	
Real Property	Torts
<input type="checkbox"/> Landlord/Tenant <input type="checkbox"/> Unlawful Detainer <input type="checkbox"/> Other Landlord/Tenant <input type="checkbox"/> Title to Property <input type="checkbox"/> Judicial Foreclosure <input type="checkbox"/> Other Title to Property <input type="checkbox"/> Other Real Property <input type="checkbox"/> Condominium Eminent Domain <input type="checkbox"/> Other Real Property	<input type="checkbox"/> Negligence <input type="checkbox"/> Auto <input type="checkbox"/> Premises Liability <input type="checkbox"/> Other Negligence <input type="checkbox"/> Malpractice <input type="checkbox"/> Medical/Dental <input type="checkbox"/> Legal <input type="checkbox"/> Accounting <input type="checkbox"/> Other Malpractice
Probate	Judicial Review/Appellate
<input type="checkbox"/> Probate (other than special case cases) <input type="checkbox"/> Summary Administration <input type="checkbox"/> General Administration <input type="checkbox"/> Special Administration <input type="checkbox"/> Set Aside <input type="checkbox"/> Trust/Conservatorship <input type="checkbox"/> Other Probate <input type="checkbox"/> Estate Value <input type="checkbox"/> Over \$200,000 <input type="checkbox"/> Between \$100,000 and \$200,000 <input type="checkbox"/> Under \$100,000 or Unknown <input type="checkbox"/> Under \$2,500	<input type="checkbox"/> Construction Defect & Contract <input type="checkbox"/> Construction Defect <input type="checkbox"/> Chapter 48 <input type="checkbox"/> Other Construction Defect <input type="checkbox"/> Contract Case <input type="checkbox"/> Uniform Commercial Code <input type="checkbox"/> Building and Construction <input type="checkbox"/> Insurance Carrier <input type="checkbox"/> Commercial Instrument <input type="checkbox"/> Collection of Accounts <input type="checkbox"/> Employment Contract <input type="checkbox"/> Other Contract
Civil Writ	Other Civil Filing
<input type="checkbox"/> Writ of Habeas Corpus <input type="checkbox"/> Writ of Mandamus <input type="checkbox"/> Writ of Quo Warrant	<input type="checkbox"/> Other Civil Filing <input type="checkbox"/> Compensation of Minor's Claim <input type="checkbox"/> Foreign Judgment <input type="checkbox"/> Other Civil Matters

Business Court filings should be filed using the Business Court cover sheet.

March 11, 2015

Date

Signature of initiating party or representative

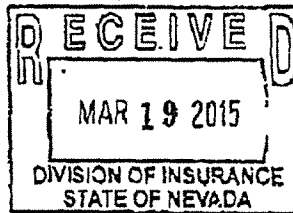
See other side for family-related case filings.

Mar 30 15 10:15a

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MAR. 26. 2015 12:51PM

NO. 019 P. 8/15

Electronically Filed
03/12/2015 11:16:01 AM

Alma L. Blum
CLERK OF THE COURT

1 **COMP**
2 **MICHAELA E. TRAMEL, ESQ.**
3 Nevada Bar No. 9466
4 **TRAMEL LAW GROUP LLC**
5 9480 S. Eastern Avenue, Ste. 257
6 Las Vegas, NV 89123
7 Tel: (702) 233-2244
8 Fax: (702) 685-9412
9 *Attorneys for Plaintiff*

10
11 **DISTRICT COURT**
12
13 **CLARK COUNTY, NEVADA**

14 **DEBORAH BURNETT-PIRRONE,**

15 Plaintiff,

16 v.

17 **STATE FARM MUTUAL AUTOMOBILE**
18 **INSURANCE COMPANY; DOES I through**
19 **X, and ROE CORPORATIONS I through X,**
20 **inclusive,**

21 Defendants.

Case No. **A- 15- 715116- C**
Dept. No. **VIII**

22 **COMPLAINT**

23 Plaintiff, **DEBORAH BURNETT-PIRRONE**, by and through her attorney, **MICHAELA**
24 **E. TRAMEL, ESQ. of TRAMEL LAW GROUP LLC**, for her causes of action against
25 Defendants, complains and alleges as follows:

26 **PARTIES AND JURISDICTION**

27 1. That at all times relevant to this action, Plaintiff **DEBORAH BURNETT-**
28 **PIRRONE** is and was a resident of Clark County, Nevada.

29 2. That upon information and belief, at all times relevant herein, Defendant **STATE**

Mar 30 15 10:16a

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MAR. 26. 2015 12:52PM

NO. 019

P. 9/15

1 FARM INSURANCE COMPANIES (hereinafter referred to as "STATE FARM") was an
2 "insurer" as defined by NRS 679A.100, licensed to conduct business and doing business in Clark
3 County, Nevada.

4 3. That all the facts and circumstances that give rise to the subject lawsuit occurred
5 in Clark County, Nevada.

6
7 4. That the true names, capacities and identities of Defendants DOES I through X
8 and Defendants ROE CORPORATIONS I through X, whether individuals, employees,
9 independent contractors, corporations, associations, partnerships, subsidiaries, holding
10 companies, owners, predecessor or successor entities, joint ventures, parent corporations or other
11 related business entities, are unknown to Plaintiff who therefore sues said Defendants by such
12 fictitious names. Plaintiff alleges that each of the Defendants designated as DOES and ROE
13 CORPORATIONS were acting on behalf of or in concert with, or at the direction of, the other
14 Defendants and are in some way responsible for the events and happenings referred to in this
15 action and proximately caused damages to the Plaintiff as herein alleged. The legal responsibility
16 of said Defendants DOES and ROE CORPORATIONS arises out of, but is not limited to, their
17 agency, master/servant or joint venture relationship with Defendants. Plaintiff requests leave of
18 Court to amend this Complaint to name the Defendants when their identities become known.
19
20

21 5. That at all times mentioned, the Defendants, including DOES and ROES, were
22 the agents, servants, employees, employers, trade ventures, and/or partners of each other. At the
23 time of the incident described in this Complaint, the Defendants were acting within the color,
24 purpose and scope of their relationships, and by reason of their relationships, Defendants are
25 jointly and severally and/or vicariously responsible and liable for the acts and omissions of their
26 Co-Defendants.
27
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Mar 30 15 10:18a

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MAR. 26. 2015 12:52PM

NO. 019 P. 10/15

6. That specifically, Plaintiff alleges that one or more of the DOE Defendants was and is liable to Plaintiff for benefits under the underinsured/uninsured motorist coverage policy of insurance and/or responsible for evaluation of Plaintiff's underinsured/uninsured motorist claim.

7. That ROE CORPORATIONS I through V are insurance companies, casualty companies, corporations, or other business entities who wrote or participated in writing Defendant's policies of insurance or who participated in the claims processing and/or handling of Plaintiff's claim, as herein alleged.

8. That specifically, Plaintiff alleges that one or more of the ROE CORPORATION Defendants was and is liable to Plaintiff for benefits under the underinsured/uninsured motorist coverage policy of insurance and/or responsible for evaluation of Plaintiff's underinsured/uninsured motorist claim.

FACTS COMMON TO ALL CLAIMS FOR RELIEF

9. On or about March 25, 2010, Plaintiff was stopped eastbound on IR 215 at Stephanie Street in a 2005 Jeep Liberty when Jerry L. Kmiec negligently failed to decrease his speed, colliding into the back of Plaintiff's vehicle, causing damage and injuries.

10. At the time, Jerry L. Kmiec had statutory and common law duties to operate his vehicle in a safe manner and to ensure the safe operation of the same.

11. Jerry L. Kmiec breached his statutory and common law duties to Plaintiff, and received a Failure to Use Due Care citation from the Nevada Highway Patrol.

12. Plaintiff sustained serious and debilitating injuries and subsequently submitted a claim to Jerry L. Kmiec's insurance carrier, Farmer's Insurance, which paid the applicable policy limits to Plaintiff.

Mar 30 15 10:19a

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MAR. 26. 2015 12:53PM

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13. That as a direct and proximate result of Jerry L. Kmiec's negligence and carelessness, Plaintiff has been caused to suffer bodily injury, disability, medical treatment, a loss of enjoyment of life, great pain and suffering of mind and body, some or all of which may be permanent and/or experienced in the future, all to her general damages in an amount in excess of \$10,000.00.

14. That as a further and proximate result of Jerry L. Kmiec's negligence and carelessness, Plaintiff was required to, and did employ, physicians and surgeons for medical examinations, treatment and care of these injuries and did incur medical and incidental expenses, in an amount in excess of \$10,000.00.

15. That as a further direct and proximate result of Jerry L. Kmiec's negligence and carelessness, Plaintiff sustained a loss of earnings and earning capacity.

16. At the time of the March 25, 2010 collision, Plaintiff was covered by a policy of insurance held with Defendant STATE FARM (policy No. C09-3352-E01-28G) providing uninsured and underinsured motorist coverage.

17. Defendant has refused to pay Plaintiff the policy limits under the applicable coverage.

FIRST CLAIM FOR RELIEF
(Underinsured Motorist Coverage/Breach of Contract)

18. Plaintiff repeats and realleges each allegation contained in paragraphs 1 through 17 of the Complaint as though fully set forth hereunder.

19. Plaintiff cannot recover the full amount of her damage against Jerry L. Kmiec, the individual proximately causing the collision and the resulting damages, because he only carried an automobile liability policy with limited coverage.

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NO. 019

P. 12/15

20. That at the time of the subject collision, Plaintiff carried UM/UIM coverage with Defendant, to which she has submitted a claim.

21. Defendant has refused to pay Plaintiff the benefits due under the UM/UIM policy with Defendant, which is a material breach of Defendant's contract.

22. As a result of Defendant's breach of contract, Plaintiff incurred compensatory and/or expectation damages, in an amount in excess of \$10,000.00.

23. That as a result of Defendant's breach of contract, Plaintiff incurred foreseeable consequential and incidental damages, in an amount in excess of \$10,000.00.

SECOND CLAIM FOR RELIEF
(Violation of the Unfair Claims Practices Act)

24. Plaintiff repeats and realleges each allegation contained in paragraphs 1 through 23 of the Complaint as though fully set forth hereunder.

25. Defendant is in violation of provisions of the Unfair Claims Practices Act (NRS 686A.310 et seq.), the violation of which was done with Defendant's actual and/or implied knowledge.

26. Pursuant to NRS 686A.310(2), Defendant is liable for any damages sustained by Plaintiff as a result of its violation of the unfair claims practices, including damages for benefits denied under the insurance policy, consequential damages, emotional distress and attorney's fees in an amount in excess of \$10,000.00.

27. Defendant denied Plaintiff's benefits with a conscious disregard for the rights of Plaintiff, that rises to the level of oppression, fraud or malice and that subjected Plaintiff to cruel and unjust hardship. Plaintiff is therefore entitled to punitive damages, in an amount in excess of \$10,000.00.

Mar 30 15 10:22a

MAR. 20. 2015 12:55PM

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THIRD CLAIM FOR RELIEF
(Breach of the Covenant of Good Faith and Fair Dealing)

28. Plaintiff repeats and reaffirms each allegation contained in paragraphs 1 through 27 of the Complaint as though fully set forth hereunder.

29. By denying and/or delaying payment of UIM benefits due under the policy, without proper cause, Defendant has failed to deal fairly and in good faith with Plaintiff.

30. That as a result of the breach of the implied covenant of good faith and fair dealing, Plaintiff is entitled to damages for denied UIM benefits, and consequential damages, including attorney's fees and emotional distress, in an amount in excess of \$10,000.00.

31. Defendant's denial of Plaintiff's benefits with conscious disregard for Plaintiff's rights rises to the level of oppression, fraud or malice that has subjected Plaintiff to cruel and unjust hardship. Plaintiff is therefore entitled to punitive damages, in an amount in excess of \$10,000.00.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays judgment of this Court as follows:

1. Compensatory and/or expectation damages for denied policy benefits in an amount in excess of \$10,000.00;
2. Consequential and/or incidental damages, including attorney's fees and emotional distress;
3. Punitive damages;

Mar 30 15 10:23a

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4. Interest from the time of service of this Complaint, as allowed by NRS 17.130;
5. Loss of earnings and earning capacity;
6. Costs of suit incurred herein;
7. For such other and further relief as this Court may deem proper.

DATED this 10th day of March, 2015.

TRAMEL LAW GROUP LLC



MICHAELA E. TRAMEL, ESQ.
Nevada Bar No. 9466
9488 S. Eastern Avenue, Ste. 257
Las Vegas, NV 89123
Attorneys for Plaintiff

Mar 30 15 10:24a

p.15

MAR. 26. 2015. 12:56PM

NO. 019 P. 15/15

\$06.00

ZIP 89101
014D128024r

RETURN RECEIPT
REQUESTED

Tempe Operations Center
German Valle

MAR 24 2015

STATE FARM MUTUAL AUTOMOBILE INS CO
ATTN: GERMAN VALLE
2700 S SUNLAND DR
TEMPE AZ 85282-3387

7014 0150 0000 5227 3373

Commissioner of Insurance
2501 E. Sahara Avenue, Suite 302
Las Vegas NV 89104

Return Service Requested

Mar 30 15 10:10a

MAR. 26. 2015 12:48PM

p.2

BRIAN SANDOVAL
Governor

STATE OF NEVADA

NO. 019 P. 2/15

BRUCE H. BRESLOW
Director



SCOTT J. KIPPER
Commissioner

Tempe Operations Center
German Valle

DEPARTMENT OF BUSINESS AND INDUSTRY
DIVISION OF INSURANCE

2501 East Sahara Avenue, Suite 302

Las Vegas, Nevada 89104-4137

(702) 486-4009 • Fax (702) 486-4007

Website: doi.nv.gov

E-mail: insinfo@doi.nv.gov

MAR 24 2015

28-3389-321

DOL 3-25-10

March 20, 2015

State Farm Mutual Automobile Insurance Company
Attn: German Valle
2700 S. Sunland Dr.
Tempe, AZ 85282-3387

RE: Deborah Burnett-Pirrone vs. State Farm Mutual Automobile Insurance Company, et al.
Eighth Judicial District Court, Clark County, Nevada
Case No. A-15-715116-C

Dear Mr. Valle:

Enclosed please find the following documents: Summons - Civil and Complaint. These documents have been served upon the Commissioner of Insurance for service of process on March 19, 2015.

The appropriate action should be taken immediately, as you may only have 30 days from the date of this service to respond.

If you have any questions regarding this service, please advise.

Sincerely,

SCOTT J. KIPPER
Commissioner of Insurance

By:

A handwritten signature in cursive script, appearing to read "Rhonda Kelly", written over a horizontal line.
RHONDA KELLY
Service of Process Clerk

Enclosures

c: Michaela E. Tramel, Esq.

Mar 30 15 10:10a

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MAR. 26. 2015 12:48PM

NO. 019 P. 3/15

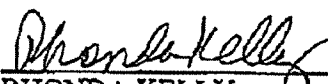
PROOF OF SERVICE

I hereby declare that on this day I served a copy of the Summons - Civil and Complaint upon the following defendant in the within matter, by shipping a copy thereof, via Certified mail, return receipt requested, to the following:

State Farm Mutual Automobile Insurance Company
Attn: German Valle
2700 S. Sunland Dr.
Tempe, AZ 85282-3387
CERTIFIED MAIL NO. 7014 0150 0000 5227 3373

I declare, under penalty of perjury, that the foregoing is true and correct.

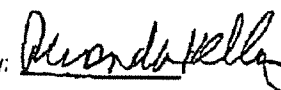
DATED this 20th day of March, 2015.


RHONDA KELLY
Employee of the State of Nevada
Department of Business and Industry
Division of Insurance

RE: Deborah Burnett-Pirrone vs. State Farm Mutual Automobile Insurance Company, et al.
Eighth Judicial District Court, Clark County, Nevada
Case No. A-15-715116-C



State of Nevada, Division of Insurance
This document on which this certificate
is stamped is a full, true and correct
copy of the original.

Date: 3/20/15 By: 

Mar 30 15 10:11a

p.4

MAR. 26. 2015 12:49PM

BRIAN SANDOVAL
Governor

STATE OF NEVADA

NO. 019 P. 4/15
DirectorSCOTT J. KIPPER
CommissionerDEPARTMENT OF BUSINESS AND INDUSTRY
DIVISION OF INSURANCE2501 East Sahara Avenue, Suite 302
Las Vegas, Nevada 89104-4137
(702) 486-4009 • Fax (702) 486-4007
Website: doi.nv.gov
Email: insinfo@doi.nv.gov

Mar 30

March 20, 2015

Michaela E. Tramel, Esq.
Tramel Law Group, LLC
9480 S. Eastern Ave., Suite 257
Las Vegas, NV 89123RE: Deborah Burnett-Pirrone vs. State Farm Mutual Automobile Insurance Company, et al.
Eighth Judicial District Court, Clark County, Nevada
Case No. A-15-715116-C

Dear Ms. Tramel:

The Division received the service of process documents on March 19, 2015 regarding the above-entitled matter. Service has been completed on State Farm Mutual Automobile Insurance Company this date and enclosed are the following:

1. A copy of our letter to State Farm Mutual Automobile Insurance Company dated March 20, 2015;
2. A certified copy of the Proof of Service dated March 20, 2015; and
3. Your receipt in the amount of \$30.00.

Pursuant to *Nevada Revised Statutes (NRS)* 680A.260, 685A.200, and 685B.050, all documents after initial service of process may be served directly to the party.

If you have any questions regarding this service, please so advise.

Sincerely,

SCOTT J. KIPPER
Commissioner of Insurance

By:

RHONDA KELLY
Service of Process Clerk

Enclosures

c: State Farm Mutual Automobile Insurance Company

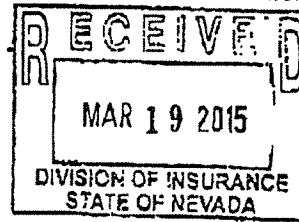
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p.5

MAR. 26. 2015 12:49PM

NO. 019

P. 5/15



1 **SUMM**
 2 **MICHAELA E. TRAMEL, ESQ.**
 Nevada Bar No. 9466
 3 **TRAMEL LAW GROUP LLC**
 9480 S. Eastern Ave., Suite 257
 4 Las Vegas, Nevada 89123
 5 Phone: (702) 233-2244
 Fax: (702) 685-9412
 6 *Attorney for Plaintiff*

Tempe Operations Center
 German Valle

MAR 24 2015

7
 8 **EIGHTH JUDICIAL DISTRICT COURT**

9 **CLARK COUNTY, NEVADA**

10 *****

11
 12 **DEBORAH BURNETT-PIRRONE,**

13 **Plaintiff,**

Case No.: A-15-715116-C

Dept. No.: VIII

14 **v.**

15
 16 **STATE FARM MUTUAL AUTOMOBILE**
INSURANCE COMPANY; DOES I through
 17 **X, and ROE CORPORATIONS I through X,**
 18 **inclusive,**

19 **Defendants.**

20 **SUMMONS-CIVIL**

21 **NOTICE! YOU HAVE BEEN SUED. THE COURT MAY DECIDE AGAINST YOU**
 22 **WITHOUT YOUR BEING HEARD UNLESS YOU RESPOND WITHIN 20 DAYS.**
READ THE INFORMATION BELOW.

23 **TO THE DEFENDANT(S):** A civil Complaint has been filed by the Plaintiff(s) against you for
 24 the relief set forth in the Complaint.

25 **STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY**

26 **1. If you intend to defend this lawsuit, within 20 days after this Summons is served on you,**
 27 **exclusive of the day of service, you must do the following:**
 28

Mar 30 15 10:13a

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MAR. 26. 2015 12:50PM

NO. 019

F. 6/15

- a. File with the Clerk of this Court, whose address is shown below, a formal written response to the Complaint in accordance with the rules of the Court, with the appropriate filing fee.
 - b. Serve a copy of your response upon the attorney whose name and address is shown below.
2. Unless you respond, your default will be entered upon application of the Plaintiff(s) and failure to so respond will result in a judgment of default against you for the relief demanded in the Complaint, which could result in the taking of money or property or other relief requested in the Complaint.
 3. If you intend to seek the advice of an attorney in this matter, you should do so promptly so that your response may be filed on time.
 4. The State of Nevada, its political subdivisions, agencies, officers, employees, board members, commission members and legislators each have 45 days after service of this Summons within which to file an Answer or other responsive pleading to the Complaint.

Submitted by:

STEVEN D. GRIERSON
CLERK OF COURT

By:

Michael E. Tramel
 MICHAELA E. TRAMEL, ESQ.
 Nevada Bar No. 9466
 9480 S. Eastern Ave., Suite 257
 Las Vegas, Nevada 89123
 Phone: (702) 233-2244
 Fax: (702) 685-9412

By:

Judith Angyalneiss MAR 17 2015
 Deputy Clerk Date
 Regional Justice Center
 200 Lewis Avenue
 Las Vegas, Nevada 89155
 JUDITH ANGYALNEISS